

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----x Index No. /2024  
KAREN CHEUNG (a/k/a WING TSZ CHEUNG),

Plaintiff,  
  
-against-

**SUMMONS WITH NOTICE**  
  
**Plaintiff designates New York  
County as place of trial**

SECURIS CAPITAL LIMITED (f/k/a AENEAS CAPITAL  
LIMITED), AENEAS MANAGEMENT LIMITED,  
KENRICK HENRY FOK, DARREN WANG YIP LUI,  
MANDY MAN LOK LUI, and AENEAS GROUP  
LIMITED),

**Venue is proper under CLPR  
§ 503(a)**

Defendants.  
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**To the above named-defendants:**

**YOU ARE HEREBY SUMMONED** to appear in this action by serving a notice of  
appearance on Plaintiff Karen Cheung (a/k/a Wing Tsz Cheung) at the address set forth below,  
and to do so within 20 days after service of this Summons (not counting the day of service  
itself), or within 30 days after service is complete if the Summons is not delivered personally to  
you within the State of New York.

**YOU ARE HEREBY NOTIFIED THAT** should you fail to answer or appear, a  
judgment will be entered against you by default for the relief demanded herein.

**PLEASE TAKE NOTICE** that this is an action to recover financial losses sustained by  
Ms. Cheung as a result of unauthorized purchase in her name of shares of Aptorum Group  
Limited, which is traded on the NASDAQ Exchange under the symbol APM in New York City.  
The relief sought arises from at least the following causes of action: (i) violations of the federal  
Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 § U.S.C. 1961(c), (ii)  
conspiracy to violate RICO, 18 U.S.C. § 1961(d), (iii) fraud, (iii) breach of fiduciary duty, (iv)

negligent misrepresentation, (v) unjust enrichment, (vi) civil conspiracy and (vii) violations of the federal Securities Act of 1933, 15 § U.S.C. 77a *et. seq.*

**PLEASE TAKE FURTHER NOTICE** that Ms. Cheung seeks in this action damages in an amount not less than \$2,000,000 USD, and punitive damages to the extent permitted by law, plus all her legal fees and costs.

**PLEASE TAKE FURTHER NOTICE** that Ms. Cheung expressly reserves the right to amend her claims in this action to include other causes of action as may be appropriate.<sup>1</sup>

By: \_\_\_\_\_  
Karen Cheung  
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+852 96871057  
*Plaintiff*

Dated: June 23, 2024

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<sup>1</sup> Consistent with New York City Bar Opinion 1987-2 and in an abundance of caution, Ms. Cheung states that this pleading has been prepared with the assistance of New York counsel.